

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MICHAEL KORS, L.L.C.,

INDEX NO: 15-CV-7939

Plaintiff,

-against-

G H R FASHION INC.,

Defendant.
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**ANSWER AND AFFIRMATIVE
DEFENSES**

JURY DEMAND

Defendant G H R FASHION INC., by and through its attorney, JOHN S. YONG, ESQ., answer the "Plaintiff's" complaint and allege as follows:

STATEMENT OF THE CASE

1. "Paragraph 1" contains a statement which no legal response is required.
2. "Paragraph 2" contains a statement which no legal response is required.
3. Deny the allegations set forth "paragraph 3" of the complaint.

JURISDICTION AND VENUE

4. "Paragraph 4" contains a statement which no legal response is required.
5. "Paragraph 5" contains a statement which no legal response is required.
6. "Paragraph 6" contains a statement which no legal response is required.
7. "Paragraph 7" contains a statement which no legal response is required.
8. "Paragraph 8" contains a statement which no legal response is required.

THE PARTIES

9. "Paragraph 9" contains a statement which no legal response is required.
10. Deny the allegations set forth in "paragraph 10" of the complaint, except that G H R Fashion Inc., is a New York Corporation and its service of process address is 145-32 34th Avenue, Flushing, New York 11354.

I. PLAINTIFF AND ITS BUSINESS

11. "Paragraph 11" contains a statement which no legal response is required.
12. "Paragraph 12" contains a statement which no legal response is required.
13. "Paragraph 13" contains a statement which no legal response is required.
14. "Paragraph 14" contains a statement which no legal response is required.
15. "Paragraph 15" contains a statement which no legal response is required.
16. "Paragraph 16" contains a statement which no legal response is required.
17. "Paragraph 17" contains a statement which no legal response is required.

II. DEFENDANT AND ITS BUSINESS

18. Deny the allegations set forth "paragraph 18" of the complaint.
19. Deny the allegations set forth "paragraph 19" of the complaint.
20. Deny the allegations set forth "paragraph 20" of the complaint.
21. Deny knowledge or information sufficient to form a belief about "paragraph 21" of the complaint.
22. Deny knowledge or information sufficient to form a belief about "paragraph 22" of the complaint.

FIRST CAUSE OF ACTION

23. Defendants repeat their answers for paragraphs 1-23 of the complaint;
24. Deny the allegations set forth "paragraph 24" of the complaint.
25. Deny the allegations set forth "paragraph 25" of the complaint.
26. Deny the allegations set forth "paragraph 26" of the complaint.
27. Deny the allegations set forth "paragraph 27" of the complaint.
28. Deny the allegations set forth "paragraph 28" of the complaint.
29. Deny the allegations set forth "paragraph 29" of the complaint.
30. Deny the allegations set forth "paragraph 30" of the complaint.
31. Deny the allegations set forth "paragraph 31" of the complaint.
32. Deny the allegations set forth "paragraph 32" of the complaint.
33. "Paragraph 33" of the complaint contains conclusions to the law to which no response is required. If a response is required, the represented defendant admits only that the Plaintiff

purports to assert the statutory basis for the Complaint pursuant to the statutes and legal authorities cited therein, and otherwise deny the remaining allegations contained therein.

SECOND CAUSE OF ACTION

34. Defendants repeat their answers for paragraphs 1-34 of the complaint;
35. "Paragraph 35" contains a statement which no legal response is required.
36. "Paragraph 36" contains a statement which no legal response is required.
37. "Paragraph 37" of the complaint contains conclusions to the law to which no response is required. If a response is required, the represented defendant admits only that the Plaintiff purports to assert the statutory basis for the Complaint pursuant to the statutes and legal authorities cited therein, and otherwise deny the remaining allegations contained therein.
38. "Paragraph 38" of the complaint contains conclusions to the law to which no response is required. If a response is required, the represented defendant admits only that the Plaintiff purports to assert the statutory basis for the Complaint pursuant to the statutes and legal authorities cited therein, and otherwise deny the remaining allegations contained therein.
39. "Paragraph 39" contains a statement which no legal response is required.
40. Deny the allegations set forth "paragraph 40" of the complaint.
41. "Paragraph 41" of the complaint contains conclusions to the law to which no response is required. If a response is required, the represented defendant admits only that the Plaintiff purports to assert the statutory basis for the Complaint pursuant to the statutes and legal authorities cited therein, and otherwise deny the remaining allegations contained therein.
42. "Paragraph 42" of the complaint contains conclusions to the law to which no response is required. If a response is required, the represented defendant admits only that the Plaintiff purports to assert the statutory basis for the Complaint pursuant to the statutes and legal authorities cited therein, and otherwise deny the remaining allegations contained therein.
43. "Paragraph 43" of the complaint contains conclusions to the law to which no response is required. If a response is required, the represented defendant admits only that the Plaintiff purports to assert the statutory basis for the Complaint pursuant to the statutes and legal authorities cited therein, and otherwise deny the remaining allegations contained therein.

THIRD CAUSE OF ACTION

44. Defendants repeat their answers for paragraphs 1-44 of the complaint;
45. "Paragraph 45" contains a statement which no legal response is required.
46. Deny the allegations set forth "paragraph 46" of the complaint.
47. "Paragraph 47" contains a statement which no legal response is required.
48. Deny the allegations set forth "paragraph 48" of the complaint.
49. Admit to the allegations set forth in "paragraph 49" of the complaint.
50. "Paragraph 50" of the complaint contains conclusions to the law to which no response is required. If a response is required, the represented defendant admits only that the Plaintiff purports to assert the statutory basis for the Complaint pursuant to the statutes and legal authorities cited therein, and otherwise deny the remaining allegations contained therein.
51. Deny the allegations set forth "paragraph 51" of the complaint.
52. Deny the allegations set forth "paragraph 52" of the complaint.
53. "Paragraph 53" of the complaint contains conclusions to the law to which no response is required. If a response is required, the represented defendant admits only that the Plaintiff purports to assert the statutory basis for the Complaint pursuant to the statutes and legal authorities cited therein, and otherwise deny the remaining allegations contained therein.

FOURTH CAUSE OF ACTION

54. Defendants repeat their answers for paragraphs 1-54 of the complaint;
55. Deny the allegations set forth "paragraph 55" of the complaint.
56. Deny the allegations set forth "paragraph 56" of the complaint.
57. Deny the allegations set forth "paragraph 57" of the complaint.
58. Deny the allegations set forth "paragraph 58" of the complaint.
59. Deny the allegations set forth "paragraph 59" of the complaint.
60. "Paragraph 60" of the complaint contains conclusions to the law to which no response is required. If a response is required, the represented defendant admits only that the Plaintiff purports to assert the statutory basis for the Complaint pursuant to the statutes and legal authorities cited therein, and otherwise deny the remaining allegations contained therein.
61. "Paragraph 61" contains a statement which no legal response is required.

62. “Paragraph 62” of the complaint contains conclusions to the law to which no response is required. If a response is required, the represented defendant admits only that the Plaintiff purports to assert the statutory basis for the Complaint pursuant to the statutes and legal authorities cited therein, and otherwise deny the remaining allegations contained therein.

FIFTH CAUSE OF ACTION

63. Defendants repeat their answers for paragraphs 1-63 of the complaint;
64. “Paragraph 64” contains a statement which no legal response is required.
65. “Paragraph 65” contains a statement which no legal response is required.
66. “Paragraph 66” of the complaint contains conclusions to the law to which no response is required. If a response is required, the represented defendant admits only that the Plaintiff purports to assert the statutory basis for the Complaint pursuant to the statutes and legal authorities cited therein, and otherwise deny the remaining allegations contained therein.
67. “Paragraph 67” of the complaint contains conclusions to the law to which no response is required. If a response is required, the represented defendant admits only that the Plaintiff purports to assert the statutory basis for the Complaint pursuant to the statutes and legal authorities cited therein, and otherwise deny the remaining allegations contained therein.

SIXTH CAUSE OF ACTION

68. Defendants repeat their answers for paragraphs 1-68 of the complaint;
69. “Paragraph 69” contains a statement which no legal response is required.
70. Deny the allegations set forth “paragraph 70” of the complaint.
71. Deny the allegations set forth “paragraph 71” of the complaint.
72. Deny the allegations set forth “paragraph 72” of the complaint.
73. “Paragraph 73” of the complaint contains conclusions to the law to which no response is required. If a response is required, the represented defendant admits only that the Plaintiff purports to assert the statutory basis for the Complaint pursuant to the statutes and legal authorities cited therein, and otherwise deny the remaining allegations contained therein.
74. “Paragraph 74” of the complaint contains conclusions to the law to which no response is required. If a response is required, the represented defendant admits only that the Plaintiff

purports to assert the statutory basis for the Complaint pursuant to the statutes and legal authorities cited therein, and otherwise deny the remaining allegations contained therein.

Defendant reserves the right to amend its Answer to raise additional affirmative defenses or pursue any available counterclaims against Plaintiff.

WHEREFORE, Represented Defendants pray that the Court enter a judgment:

- 1) dismissing the Complaint with prejudice;
- 2) granting Defendants their costs, including attorneys' fees, incurred in this action; and
- 3) granting such other and further relief as the Court may deem just and proper.

Dated: November 5, 2015

New York, New York

By: /s/ John S. Yong
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